

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Rochelle E. Dunlap)	Case No. 12-13677
)	Chapter 13 Proceedings
Debtor.)	Judge Jessica E. Price Smith

**CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR'S
MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN**

Now comes **CRAIG SHOPNECK**, the duly appointed, qualified, and standing Chapter 13 Trustee (the "Trustee") herein, by and through counsel, and hereby objects to the Debtor's Motion to Modify Confirmed Chapter 13 Plan filed with this Court on June 12, 2013 (hereinafter "Debtor's Motion"). In support of his objection, the Trustee makes the following representations to the Court:

1. The Trustee does not believe the Debtor's Motion complies with *In re Seafort*, 669 F.3rd 662 (6th Cir. Feb. 15, 2012) as the Debtor continues voluntary retirement contributions without offering 100% dividend to unsecured creditors.
2. In order for the Trustee to verify the Debtor is complying with Sections 1329, 1322, and 1325(a) of the Bankruptcy Code, the Trustee is requesting: 1) pay advices for the Debtor and her spouse; (2) 2012 federal income tax return; and (3) balance of spouse's car loan.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Motion for the reasons cited.

Respectfully submitted,

/S/ Holly Davala

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CERTIFICATE OF SERVICE

I certify that on June 17, 2013, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Jonathan I. Krainess, Attorney, on behalf of Debtor, at jkrainess@sbcglobal.net

And by regular U.S. mail, postage prepaid, on:

Rochelle E. Dunlap, Debtor at 5800 Deborah Drive, North Ridgeville, OH 44039

/S/ Holly Davala

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